

**DRAFT
PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT**

August 28, 2016

**Lubricants Impact Cleanup Plan
Lard Oil Company
914 Florida Avenue SW
Denham Springs, Louisiana**

PPM Consultants, Inc. (PPM) has prepared this Lubricants Impact Cleanup Plan associated with the lubricants release from the Lard Oil Company (Lard Oil) facility located at 914 Florida Avenue SW, Denham Springs, Louisiana, during the catastrophic flooding event on August 13, 2016. A site plan showing the affected lubricants impact area is presented as **Figure 1, Site Plan, Attachment A**.

PPM has conducted inspections at the majority of the properties in the affected lubricants impact area August 20 through 28, 2016 and has prepared a summary table documenting potentially impacted media on each property, see **Table 1, Lubricants Impact Cleanup Plan, Attachment B**. The cleanup activities (completed and planned) for each affected media are described below.

Exterior of Structures – Structure exteriors will be pressure washed to remove all staining associated with potential lubricants impact.

Grass – Impacted grass will be cut with a bagging mower and the grass clippings will be placed in plastic bags for proper disposal at an industrial landfill.

Shrubs – Impacted branches and/or leaves from shrubs will be cut and will be placed in plastic bags for proper disposal at an industrial landfill.

Chain Link Fence – Stained chain link fence will be pressure washed to remove all staining associated with potential lubricants impact.

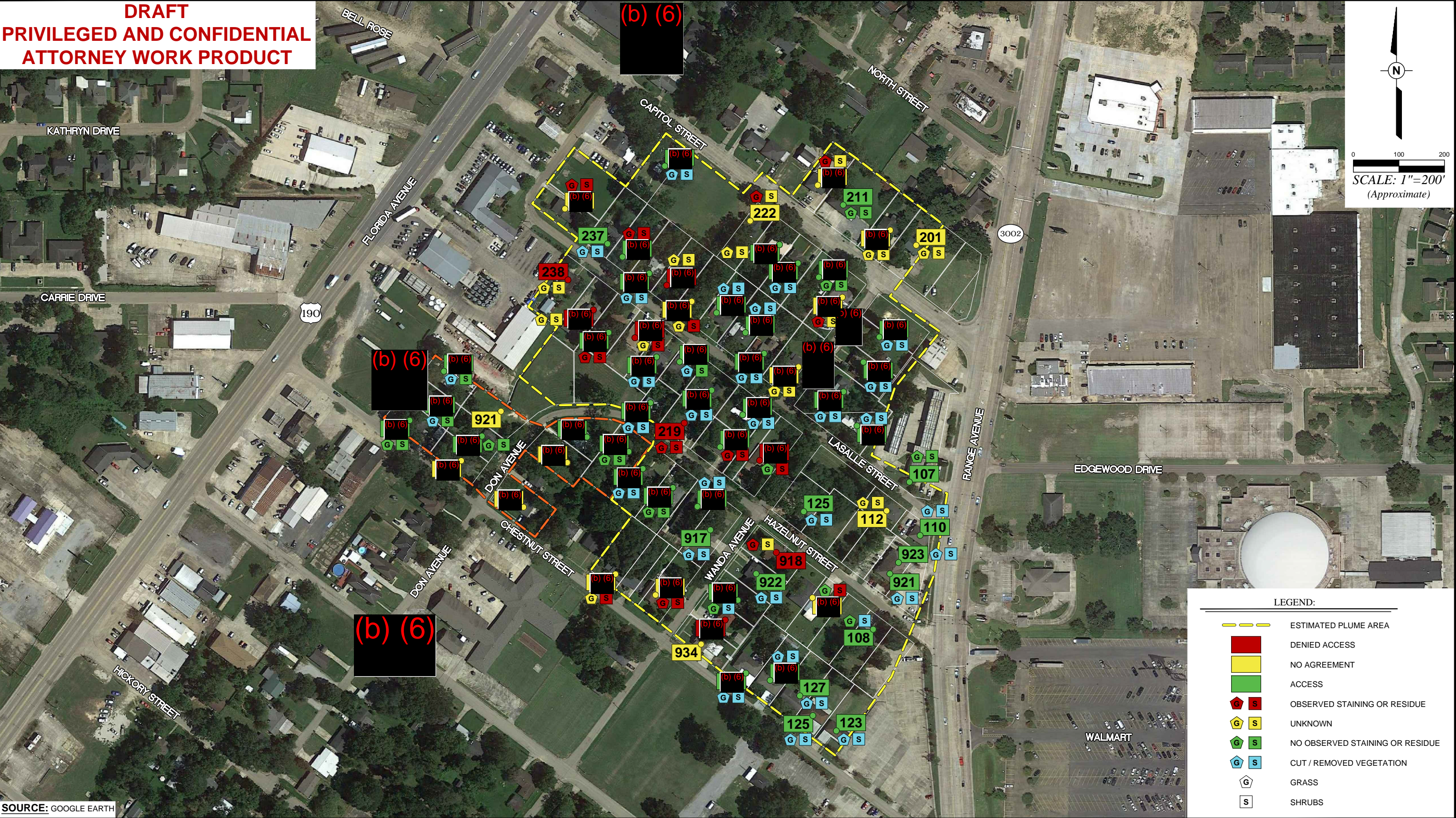
Wood Fence – Stained wood fencing will be removed and placed in containers for proper disposal at an industrial landfill.

Soil – Visually impacted soil will be removed and stored in drums for proper disposal at an industrial landfill. Confirmation samples will be collected from the remaining soil for analyses for Extractable Petroleum Hydrocarbons (EPH) by the Massachusetts Department of Environmental Protection (MADEP) Method at an accredited analytical laboratory.

Interior of Structures – Following completion of house gutting by owners, PPM will collect wipe samples of potentially impacted areas for analyses for TPH-D and TPH-O to verify the presence of lubricants. If lubricant presence is verified, a site specific mitigation plan will be generated for the structure. Indoor air samples will be collected as needed to verify indoor air quality associated with potential lubricants in structures.

ATTACHMENT A – SITE PLAN

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SOURCE: GOOGLE EARTH

PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: BWH	DRAWN DATE: 08/28/16
PROJECT NUMBER: 542321	BILLING GROUP: ER

LARD OIL COMPANY, INC.
DENHAM SPRINGS FACILITY
914 FLORIDA AVENUE
DENHAM SPRINGS, LOUISIANA

ACCESS AGREEMENTS AND RESPONSE ACTIVITIES DAILY STATUS

FIGURE
NUMBER
X

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ATTACHMENT B – LUBRICANTS IMPACT CLEANUP PLAN

LUBRICANTS IMPACT CLEANUP PLAN

Street	Address #	Structure Type		House		Grass	Shrubs	Fence		Soil	Notes
		Commercial	Residential	Interior	Exterior			Chain Link	Wood		
HAZELNUT	108	x			x	x	x				Trimmed shrubs 8/27/16, cut grass 8/28/16, schedule pressure wash exterior of structure.
	(b) (6)		x								Need Access
	125	x		x	x	x	x				Cut grass 8/23/16, trimmed shrubs 8/26/16, structure to be demolished per property owner.
	(b) (6)		x					x			Cut grass and trimmed shrubs 8/27/16, schedule removal of wood fence.
			x		x	x	x				Cut grass and trimmed shrubs 8/28/16, schedule pressure washing of exterior of structure
			x		x	x	x	x			Cut grass and trimmed shrubs 8/26/16, schedule pressure wash exterior and chain link fence
			x		x	x	x	x	x		Denied access after inspection
											Denied Access
			x								No evidence of staining on property, cut grass and trim shrubs 8/28/16
			x		x	x	x	x		x	Cut grass 8/22/16, trimmed shrubs 8/24/16, schedule pressure wash exterior of structure and chain link fence, schedule soil removal
											Denied Access
WANDA	917		x			x					Cut grass 8/22/16, trimmed shrubs 8/26/16
	(b) (6)										Denied Access
	922		x		x		x	x			Trimmed shrubs and cut grass 8/27/16, schedule pressure washing of chain link fence
	(b) (6)		x			x		x		x	Trimmed shrubs 8/27/16, cut grass 8/28/16, schedule pressure washing of chain link fence and soil removal
											Denied Access
LASALLE	934		x								Need Access
	107	x			x	x	x				Need access to interior, schedule pressure wash exterior of structure
	110	x				x	x		x		Structure being demolished, grass cut 8/22/16, shrubs trimmed 8/26/16
	112										Need Access
	(b) (6)		x	x		x	x	x			Cut grass and trimmed shrubs 8/25/16, schedule pressure wash chain link fence,
											Need Access
			x			x	x	x			Cut grass and trimmed shrubs 8/24/16, schedule pressure wash of chain link fence
			x		x	x		x			Cut grass and trimmed shrubs 8/24/16, schedule pressure wash of exterior of structure and chain link fence
			x		x	x	x		x	x	Cut grass and trimmed shrubs 8/25/16, schedule visually impacted soil removal, removal of wooden fence, pressure washing of house and shed
			x		x		x	x			Cut grass 8/22/16, trimmed shrubs 8/24/16, pressure wash exterior of structure by others, schedule pressure wash of chain link fence
			x			x	x			x	Cut grass 8/22/16, schedule shrub trimming, soil removal, pressure wash chain link fence
			x		x	x	x	x			Cut grass and trimmed shrubs 8/23/16, schedule pressure wash of chain link fence, and exterior of structure
											Need Access
			x			x	x	x			Cut grass 8/22/16, trimmed shrubs 8/26/16, schedule pressure washing of chain link fence
											Denied Access
											Denied Access
			x		x		x		x	x	Denied access after inspection
			x		x	x	x	x			Cut grass and trimmed shrubs 8/26/16, schedule pressure washing of structure exterior and chain link fence
			x				x	x	x	x	Trim shrubs on 8/29/16, schedule soil removal and wooden fence removal, and pressure wash chain link fence
											Denied Access
	237		x		x	x	x	x			Cut grass 8/22/16, trimmed shrubs 8/23/16, schedule pressure wash structure exterior and chain link fence
	(b) (6)										Denied Access

Street	Address #	Commercial	Residential	Interior	Exterior	Grass	Shrubs	Chain Link	Wood	Soil	Notes
(b) (6)	(b) (6)		x		x	x					Need access to interior, cut grass and trim shrubs 8/25/16, schedule pressure wash exterior of structure
			x				x	x		x	Cut grass and trimmed shrubs 8/24/16, schedule pressure wash chain link fence and soil removal
			x		x	x	x	x		x	Cut grass and trimmed shrubs 8/25/16, schedule pressure washing of chain link fence and house exterior, and soil removal
CAPITOL	201										Need access
	(b) (6)										Need access, owner reviewing
											Need access
			x		x	x	x	x		x	Cut grass and trimmed shrubs 8/28/16, schedule pressure wash exterior of structure and chain link fence, and soil removal, shed to be demolished per property owner.
	211	x				x	x				Cut grass and trimmed shrubs 8/28/16
	(b) (6)		x			x	x	x			Cut grass and trimmed shrubs 8/26/16, schedule pressure wash chain link fence
			x			x	x	x			Schedule grass cutting, shrub trimming, and pressure washing of chain link fence
											Need Access
											Need Access
			x				x	x			Cut grass 8/22/16, trimmed shrubs 8/24/16, schedule pressure washing of chain link fence
(b) (6)											Need Access
CHESTNUT	123		x		x	x	x	x	x		Cut grass and trimmed shrubs 8/27/16, schedule pressure wash of structure exterior and chain link fence, schedule wood fence removal
	125		x		x		x	x			Cut grass and trimmed shrubs 8/27/16, schedule pressure wash of structure exterior and chain link fence
	127		x		x	x	x	x			Cut grass and trimmed shrubs 8/27/16, schedule pressure wash of structure exterior and chain link fence
	(b) (6)		x		x			x			Cut grass and trimmed shrubs 8/27/16, schedule pressure wash of structure exterior and chain link fence
			x		x	x		x	x		Cut grass and trimmed shrubs 8/27/16, schedule pressure wash of structure exterior and chain link fence, schedule wood fence removal
											Need Access
											Need Access
S. RANGE	921	x				x	x		x		Cut grass and trimmed shrubs 8/27/16, schedule removal of wooden fence
	923	x				x	x		x		Cut grass and trimmed shrubs 8/27/16, schedule removal of wooden fence
(b) (6)	(b) (6)		x								No staining observed by PPM, EPA indicated small oil stain on patio, Marine products found in yard. Cut grass 8/24/16
			x								No staining observed by PPM, apparent oil sheen on water puddles in rear yard, Marine products found in yard. Cut grass 8/24/16
			x			x				x	Patches of missing grass with staining on side and rear of structure. Marine oil drum found in rear fence
			x		x	x	x				Marine products (oil, boat fuel tanks, drums, parts, etc.) found in yard
DON AVENUE	921										Need Access
											Need Access
	(b) (6)										Inspection 8/28/16
											Need Access
											Need Access